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March 18, 2024

VIA ECF

Hon. Mary Kay Vyskocil
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

USDC SDNY
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Re: Moina v Pjetto Juncaj Home Improvement Inc. et. al.
Case No.: 1:22-cv-07014-MKV

Dear Judge Vyskocil:

We represent Plaintiff in this matter. We write in accordance with the Court's March 7, 2024 endorsement and order.

An amended petition was filed in February 2024 making various corrections, including changing the Defendant's date of death. However, the executor has still not been appointed in the deceased Defendants' probate proceedings in Bronx Surrogate's Court. Once the executor is appointed, Plaintiff intends to amend his Complaint to replace the individual Defendant with the executor of the individual Defendant's estate. Plaintiff's counsel also attempted to contact the Defendant's estate attorney in late November by mail and e-mail, but has yet to receive a response.


Plaintiff respectfully requests 30 additional days to amend the complaint, until April 17, 2024, by which time the executor will hopefully be appointed.

Thank you for your attention to the above.

Respectfully Submitted,
-----/s/-----
Michael Taubenfeld

Granted. SO ORDERED. Amended Complaint due
April 17, 2024. NO FURTHER EXTENSIONS OF THIS
DEADLINE.

Date: April 11, 2024
New York, New York


Mary Kay Vyskocil
United States District Judge